

INFORMATION REQUEST NUMBER 26

RECEIVED

JUL 15 1991

SAFE SECTION

0714

Site:	Uk+Laka Pond
ID #	MA079900932
Break:	116
Other:	Radlaw 071
7-15-91	



40057644
SUPERFUND RECORDS



LAI 0309

CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

11/3/88

PRODUCER

MD. INS. MGMT. SERV., INC.
9475 DEERECO ROAD, SUITE 300
TIMONIUM, MD 21093

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE

COMPANY
LETTER **A**

NATIONAL UNION FIRE INS CO

COMPANY
LETTER **B**

COMPANY
LETTER **C**

COMPANY
LETTER **D**

COMPANY
LETTER **E**

INSURED

LIDLAW WASTE SYSTEMS (BRIDGETON)
13570 ST. CHARLES ROCK ROAD
BRIDGETON, MISSOURI 63044

COVERAGES

THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
A	GENERAL LIABILITY	RMGLA9601764	9/01/88	UNTIL CANCELLED	GENERAL AGGREGATE 2000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				PRODUCTS-COMP/OPS AGGREGATE 2000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCURRENCE				PERSONAL & ADVERTISING INJURY 1000
	<input type="checkbox"/> OWNER'S & CONTRACTORS PROTECTIVE				EACH OCCURRENCE 1000
					FIRE DAMAGE (ANY ONE FIRE) 1000
A	AUTOMOBILE LIABILITY	RMB A9198494	9/01/88	UNTIL CANCELLED	MEDICAL EXPENSE (ANY ONE PERSON) 10
	<input checked="" type="checkbox"/> ANY AUTO				CSL 1000
	<input checked="" type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (PER PERSON)
	<input checked="" type="checkbox"/> SCHEDULED AUTOS				BODILY INJURY (PER ACCIDENT)
	<input checked="" type="checkbox"/> HIRED AUTOS				PROPERTY DAMAGE
	EXCESS LIABILITY				EACH OCCURRENCE AGGREGATE
	<input type="checkbox"/> OTHER THAN UMBRELLA FORM				
A	WORKERS' COMPENSATION AND EMPLOYERS' LIABILITY	RMWC1126442	9/01/88	UNTIL CANCELLED	STATUTORY 1000 (EACH ACCIDENT)
					1000 (DISEASE-POLICY LIMIT)
					1000 (DISEASE-EACH EMPLOYEE)
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

CERTIFICATE HOLDER

WEST LAKE QUARRY INC.
12976 ST. CHALRES ROCK ROAD
BRIDGETON, MISSOURI 63044

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

MARY CLARE PICK

CERTIFICATE OF INSURANCE
05/14/91

PRODUCER
MIMS INTERNATIONAL LTD.
901 DULANEY VALLEY RD #610
BALTIMORE, MD
21204
PHONE 301-296-1500

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

COMPANIES AFFORDING COVERAGE
INSURED
COMPANY LETTER A NATIONAL UNION FIRE INS. CO.
COMPANY LETTER B
COMPANY LETTER C
COMPANY LETTER D
COMPANY LETTER E

LIDLAW WASTE SYSTEMS INC.
13570 ST. CHARLES ROCK RD
BRIDGETON, MO
63044

> COVERAGES <-----
 THIS IS TO CERTIFY THAT POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL TERMS, EXCLUSIONS, AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFF DATE	POLICY EXP DATE	ALL LIMITS IN THOUSANDS	
A	GENERAL LIABILITY	RMGL2498417	09/01/90	09/01/93	GENERAL AGGREGATE	2000
	<input checked="" type="checkbox"/> COMMERCIAL GEN LIABILITY				PRODS-COMP/OPS AGG.	2000
	<input checked="" type="checkbox"/> [] CLAIMS MADE <input checked="" type="checkbox"/> OCC.				PERS. & ADVG. INJURY	1000
	[] OWNER'S & CONTRACTORS PROTECTIVE				EACH OCCURRENCE	1000
	[]				FIRE DAMAGE (ANY ONE FIRE)	1000
A	AUTOMOBILE LIAB	RMCA5629399	09/01/90	09/01/93	MEDICAL EXPENSE (ANY ONE PERSON)	10
	<input checked="" type="checkbox"/> ANY AUTO				CSL	1000
	<input checked="" type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (PER PERSON)	
	<input checked="" type="checkbox"/> SCHEDULED AUTOS				BODILY INJURY (PER ACCIDENT)	
	<input checked="" type="checkbox"/> HIRED AUTOS				PROPERTY	
A	EXCESS LIABILITY				OTHER THAN UMBRELLA FORM	
	<input type="checkbox"/> UMBRELLA FORM				EACH OCC	AGGREGATE
A	WORKERS' COMP AND EMPLOYERS' LIAB	RMWC4195095	09/01/90	09/01/93	STATUTORY	1000
A		RMWC4195095	09/01/90	09/01/93	1000	EACH ACC DISEASE-POLICY LIMIT
	OTHER				1000	DISEASE-EACH EMPLOYEE

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

> CERTIFICATE HOLDER <-----
PATTONVILLE SCHOOL DISTRICT
ATTN: PAULA
115 HARDING
MARYLAND HEIGHTS, MO
63043

CANCELLATION <-----
 SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

ACORD 25-S (3/88)

AUTHORIZED REPRESENTATIVE

5-7 1991

L A I D L A W

CONFIRMATION

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5028, BURLINGTON, ONTARIO, CANADA L7R 3Y8 (416) 336-1800 FAX (416) 336-3976

May 27, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

**Re: CERCLA Section 104(e) Information Requests
to Laidlaw Waste Systems (Bridgeton), Inc.,
Laidlaw Waste Systems, Inc., and
West Lake Landfill, Inc.**

We are in receipt of your referenced Information
Requests dated May 14, 1991.

It would enable us to respond if you are able to define
with more precision the area which is the subject of your
enquiry.

Laidlaw Waste Systems (Bridgeton), Inc. operates a
landfill in the general area which you describe, but which does
not include the area which has been subject to NRC investigations
and which is understood to include radioactive material. We do
not see the relevance or authority for enquiries pertaining to
the present Laidlaw Waste Systems (Bridgeton), Inc. site, and
request your confirmation that such site is not meant to be
included in your enquiry.

I would be pleased to discuss this matter with you at
any time.

Yours very truly,



William R. Cottick
Associate General Counsel

WRC/lc

LA1 0310

L A I D L A W

CONFIRMATION

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5028, BURLINGTON, ONTARIO, CANADA L7R 3Y8 (416) 336-1800 FAX (416) 336-3976

June 4, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

**Re: CERCLA Section 104(e) Information Requests
to Laidlaw Waste Systems (Bridgeton), Inc.,
Laidlaw Waste Systems, Inc., and
West Lake Landfill, Inc.**

Further to my letter of May 27, 1991, I am writing to request a 30 day extension to the response date, to July 15, 1991. I attempted to reach you by telephone, but was advised you were out of the office until June 7.

In order to enable a response, I would like to discuss with you the area (location) which is the subject of your enquiry. It may be that we can provide information which will assist you in focusing your inquiry, but I would like to discuss and confirm with you the approach to be taken.

It does not appear, even when the area subject to your inquiry is clarified, that information can be assembled and a meaningful response prepared within the time frame set out in your information request letters, and an extension is therefore requested.

.... /2

LAI 0311

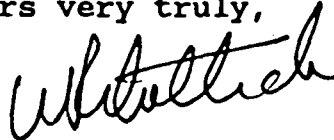
2/....

Ms. D.L. Newman

June 4, 1991

I would be pleased to discuss this matter with you at any time.

Yours very truly,

A handwritten signature in dark ink, appearing to read "W. R. Cottick", written in a cursive style.

William R. Cottick
Associate General Counsel

WRC/lc

SPENCER FANE BRITT & BROWNE

JAMES T. BRITT
WILLIAM H. WOODSON **
ROBERT P. LYONS
RICHARD H. SPENCER
DONALD W. GIFFIN **
LOWELL L. SMITHSON
JAMES R. WILLARD
GAD SMITH **
EDWARD A. SETZLER
RICHARD W. SCARRITT
JACK L. WHITACRE
BASIL W. KELSEY **
JEROME T. WOLF **
MENDEL SMALL
JAMES G. BAKER
JACOB F. MAY, JR. **
CARL H. HELMSTETTER
E. J. HOLLAND, JR.
CHARLES F. MYERS
JAMES W. KAPP, JR.
JAMES R. HUDEK
STANLEY E. CRAVEN

RONALD L. LANGSTAFF
SANDRA L. SCHERMERHORN
MICHAEL C. KIRK
MICHAEL F. DELANEY
I. EDWARD MARQUETTE
CURTIS E. WOODS
RUSSELL W. BAKER, JR.
GARDINER B. DAVIS
JUDITH L. HANCOCK
J. NICK BADGEROW **
DAVID D. GATCHELL
TERRY W. SCHACKMANN **
PAUL D. COWING
SCOTT J. GOLDSTEIN
MARK P. JOHNSON
JAMES T. PRICE
GEORGANN H. EGLINSKI **
BRUCE E. CAVITT **
WILLIAM C. MARTUCCI
RICHARD H. HERTEL *
JOHN L. UTZ
MICHAEL F. SAUNDERS

1400 COMMERCE BANK BUILDING
1000 WALNUT STREET
KANSAS CITY, MISSOURI 64106-2140
PHONE (816) 474-8100
TELEX 43-4345
FAX (816) 474-3216

KANSAS OFFICE
SUITE 500, 40 CORPORATE WOODS
9401 INDIAN CREEK PARKWAY
P.O. BOX 25407
OVERLAND PARK, KANSAS 66225-5407
PHONE (913) 345-8100
FAX (913) 345-0736

WASHINGTON, D.C. OFFICE
1133 CONNECTICUT AVENUE, N.W.
SUITE 1000
WASHINGTON, D.C. 20036
PHONE (202) 775-2376
FAX (202) 833-8491

MARK A. THORNHILL
DAVID L. WING **
JAMES A. SNYDER
GREGORY C. LAWTON
BRIAN H. DUNN
BRIAN N. KAUFMAN
KENNETH A. MASON
PARTHENIA B. EVANS **
TERESA A. WOODY
ELAINE D. KOCH **
ANDREW W. STUMPF
MICHAELA M. WARDEN *
CINDY SESLER BALLARD
STEPHANIE A. MATHEWS **
AMY L. PECK
MICHAEL D. HOCKLEY **
JAMES H. ANDREASEN
DOUGLAS J. EDMONDS **
EDWARD C. FENSHOLT *
MARY VIRGINIA CLARKE **
ALISON ARMSTRONG **
MARK SCUDDER **

DAVID L. BLACK **
SUSAN G. CAMPBELL **
THERESE M. SCHUELE **
MARK C. THOMPSON **
LINDA S. DICKENS
JAN P. HELDER, JR. **
BRIAN F. STAYTON **
THOMAS J. WILCOX **
PEGGY F. SCHMITT
LORI H. HILL **
NANCY M. LANDIS **
MARY ANN DUPONT **
TIMOTHY C. MEYER
DAVID C. LINDER
DOUGLAS M. WEEMS
SAMUEL P. LOGAN
LYNNE M. BOHSE
MARILYN P. DUNN
MICHAEL L. MCCANN
LINDA P. GUEVEL
MARY S. SHAFER
ALICE J. FISCHER **

CHARLES S. SCHNIDER **
MITCHELL S. PETTIT *
A.K. WNIOROWSKI
SHIRLEY EDMONDS-GOZA
OF COUNSEL

WRITER'S DIRECT DIAL NUMBER IS:

RECEIVED

JUL 29 1991

SAFE SECTION

PLEASE REPLY TO THE MISSOURI OFFICE

FILE NO. 2741000-1

July 24, 1991

Ms. Diana L. Newman
United States Environmental
Protection Agency, Region VII
Superfund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: CERCLA Section 104(e) Information Requests to Laidlaw
Waste Systems (Bridgeton), Inc., Laidlaw Waste Systems,
Inc., and West Lake Landfill, Inc.

Dear Ms. Newman:

I am enclosing additional information in response to Question 3.6 of the requests (names and addresses of Respondents' officers and directors) by providing a list of officers and directors of Laidlaw Waste Systems (Bridgeton), Inc., copies of two corporate resolutions relating to Laidlaw Waste Systems (Bridgeton), Inc. and a copy of a written consent of the Board of Directors of Laidlaw Waste Systems, Inc. This last document is also responsive to Information Request 5.6.

Very truly yours,

Sandra L. Schermerhorn
Sandra L. Schermerhorn

SLS/cw
Enclosures

LA1 0312

OFFICERS AND DIRECTORS OF LWS (BRIDGETON) INC.

OFFICERS.

Donald K. Jackson 77 Lowther Toronto, Ontario M5R 1C9	- President
Charles Leonard 2101 Chimney Rock Inverness, Illinois 60067	- Senior Vice-President
Greg Peterson 24 Denewood Crescent Don Mills, Ontario M3B 1M5	- Vice-President, Sales and Marketing
Michael Brophy 158 Blythe Crescent Oakville, Ontario L6J 5H6	- Vice-President, Human Resources
Ronald Priest 2222 Belgrave Court Burlington, Ontario L7P 3R5	- Vice-President, Maintenance and Purchasing
Ronald Poland 5082 Woodland Drive Lewiston, New York 14092	- Vice-President, Environmental Management
Richard A. Norris 2079 Pineview Drive Oakville, Ontario L6H 5M5	- Vice-President Accounting and Senior Controller
Dick van Wyck 4077 Stonemason Crescent Mississauga, Ontario L5L 2X5	- Assistant Secretary

- 2 -

Thomas Folwer
2001 Vista Trail
Raonoke, Texas
76262

- Secretary

DIRECTORS

Donald K. Jackson
address same as above

- sole Director

**RESOLUTION OF THE SOLE SHAREHOLDER
OF
LAIDLAW WASTE SYSTEMS (BRIDGETON) INC.**

The undersigned, being the sole shareholder of LAIDLAW WASTE SYSTEMS (BRIDGETON) INC. (the "Corporation"), hereby consents to and adopts the following resolutions:

BE IT RESOLVED THAT:

1. The present Directors of the Corporation are hereby removed from their positions as Directors.
2. As a special resolution, the number of Directors of the Corporation be fixed at one.
3. The following named person is elected to serve as Director of the Corporation until his successor is duly elected or until he resigns:

Donald K. Jackson

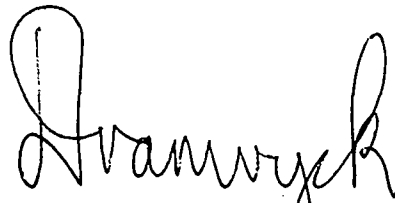
Dated: January 2, 1991.

LAIDLAW WASTE SYSTEMS HOLDINGS, INC.

By:



Vice-President



Secretary

Being the sole shareholder of the Corporation.

**RESOLUTION OF THE SOLE DIRECTOR
OF
LAIDLAW WASTE SYSTEMS (BRIDGETON) INC.**


The undersigned, being the sole director of LAIDLAW WASTE SYSTEMS (BRIDGETON) INC. (the "Corporation"), hereby consents to and adopts the following resolutions.

BE IT RESOLVED THAT:

1. The present Officers of the Corporation are hereby removed from their positions as Officers.
2. The following named persons are elected to serve as Officers of the Corporation until their successor is duly elected or until they resign:

Donald K. Jackson	- President
Charlie Leonard	- Senior Vice-President
Greg Peterson	- Vice-President, Sales and Marketing
Michael Brophy	- Vice-President, Human Resources
Ronald Priest	- Vice-President, Maintenance and Purchasing
Ronald Poland	- Vice-President, Environmental Management
Richard A. Norris	- Vice-President Accounting, Senior Controller
Dick van Wyck	- Assistant Secretary
Thomas Fowler	- Secretary

Dated: April 5, 1991.



Donald K. Jackson

Being the sole Director of the Board of Directors of
the Corporation.

**UNANIMOUS WRITTEN CONSENT OF
BOARD OF DIRECTORS OF
LAIDLAW WASTE SYSTEMS INC.**

The undersigned, being all of the members of the Board of Directors of Laidlaw Waste Systems Inc. (the "Company"), hereby consent to and adopt the following resolutions:

BE IT RESOLVED THAT:

1. The Company approved that certain Agreement dated June 29, 1988 ("Agreement") and other related documents among Laidlaw Industries, Inc, a Delaware Corporation, West Lake Landfill, Inc., a corporation, West Lake Quarry and Material Company, a corporation, West Lake Ready Mix Co., a corporation, John L. May Archbishop of St. Louis, in his capacity as the Archbishop of the Archdiocese of St. Louis and not individually, St. Jude League, a corporation, also known as The Shrine of St. Jude, and The Society for the Propagation of the Faith, Archdiocese of St. Louis, a corporation, for the purchase of all issued and outstanding capital stock of Landfill, and containing other terms and provisions as discussed and reviewed by the undersigned directors.

2. That J. Edward Fixari as President of the Company be and is hereby authorized and empowered to do each and every act necessary or incidental to carrying out the above described transaction, including executing the Agreement and all agreements and documents ancillary thereto on behalf of the Company in the form presented to and approved by the undersigned directors with such changes therein as may be deemed appropriate by such officer.

3. That all actions heretofore taken by the officer of the Company, and all things done by his authority with respect to the above described transaction be, and the same hereby ratified and approved.

CERTIFICATE

I, Thomas J. Fowler, being the duly elected Assistant Secretary of Laidlaw Waste Systems Inc., a Delaware corporation (the "Company") do hereby certify that the above is a true and correct copy of resolutions adopted by the unanimous written consent of the Board of Director of the Company. The above resolutions are in conformity with the Certificate of Incorporation and By-laws of the Company, and have not been modified or repealed, and remain in full force and effect as of the date hereof.

IN WITNESS WHEREOF, I have hereunto set my name this 29th day of July, 1988.

Thomas J. Fowler
Assistant Secretary

RECEIVED

JUN 19 1991

SAFE SECTION

JUN 13 1991

William R. Cottick, Esq.
Laidlaw Inc.
3221 North Service Road
P.O. Box 5028
Burlington, Ontario, Canada L7R 3Y8

RE: West Lake Landfill
Bridgeton, Missouri

Dear Mr. Cottick:

Pursuant to our telephone conversation of June 12, 1991, EPA has granted your request for an extension of time to respond to those CERCLA § 104(e) Information Requests directed to Laidlaw Waste Systems (Bridgeton), Inc., Laidlaw Waste Systems, Inc., and West Lake Landfill, Inc. Accordingly, it is my understanding that the responses to such information requests will be submitted to EPA by July 15, 1991.

As we also discussed in our telephone conversation, the term "the site" as defined in the Information Requests includes not only those areas within the geographic boundaries set forth in the Information Requests where radioactive materials may be found, but also includes any areas within such boundaries where hazardous substances, hazardous wastes, solid wastes, pollutants and contaminants (as such terms are defined in CERCLA and RCRA) may be found.

If you have any questions regarding this matter, please do not hesitate to contact me at (913) 551-7503.

Sincerely,

David A. Hoefer
Assistant Regional Counsel

cc: Diana L. Newman - SAFE

LAI 313

AUG 06 1991

SPENCER FANE BRITT & BROWNE

SAFE SECTION

JAMES T. BRITT
WILLIAM H. WOODSON **
ROBERT P. LYONS
RICHARD H. SPENCER
DONALD W. GIFFIN **
LOWELL L. SMITHSON
JAMES R. WILLARD
GAD SMITH **
EDWARD A. SETZLER
RICHARD W. SCARRITT
JACK L. WHITACRE
BASIL W. KELSEY **
JEROME T. WOLF **
MENDEL SMALL
JAMES G. BAKER
JACOB F. MAY, JR. **
CARL H. HELMSTETTER
E. J. HOLLAND, JR.
CHARLES F. MYERS
JAMES W. KAPP, JR.
JAMES R. HUDEK
STANLEY E. CRAVEN

RONALD L. LANGSTAFF
SANDRA L. SCHERMERHORN
MICHAEL C. KIRK
MICHAEL F. DELANEY
I. EDWARD MARQUETTE
CURTIS E. WOODS
RUSSELL W. BAKER, JR.
GARDINER B. DAVIS
JUDITH L. HANCOCK
J. NICK BADGEROW **
DAVID D. GATCHELL
TERRY W. SCHACKMANN **
PAUL D. COWING
SCOTT J. GOLDSTEIN
MARK P. JOHNSON
JAMES T. PRICE
GEORGANN H. EGLINSKI **
BRUCE E. CAVITT **
WILLIAM C. MARTUCCI
RICHARD H. HERTEL *
JOHN L. UTZ
MICHAEL F. SAUNDERS

1400 COMMERCE BANK BUILDING
1000 WALNUT STREET
KANSAS CITY, MISSOURI 64106-2140
PHONE (816) 474-8100
TELEX 43-4345
FAX (816) 474-3216

KANSAS OFFICE
SUITE 500, 40 CORPORATE WOODS
9401 INDIAN CREEK PARKWAY
P.O. BOX 25407
OVERLAND PARK, KANSAS 66225-5407
PHONE (913) 345-8100
FAX (913) 345-0736

WASHINGTON, D.C. OFFICE
1133 CONNECTICUT AVENUE, N.W.

SUITE 1000
WASHINGTON, D.C. 20036
PHONE (202) 775-2376
FAX (202) 833-8491

MARK A. THORNHILL
DAVID L. WING **
JAMES A. SNYDER
GREGORY C. LAWHON
BRIAN H. DUNN
BRIAN N. KAUFMAN
KENNETH A. MASON
PARTHENIA B. EVANS **
TERESA A. WOODY
ELAINE D. KOCH **
ANDREW W. STUMPF
MICHAELA M. WARDEN *
CINDY SESLER BALLARD
STEPHANIE A. MATHEWS **
AMY L. PECK
MICHAEL D. HOCKLEY **
JAMES H. ANDREASEN
DOUGLAS J. EDMONDS **
EDWARD C. FENSHOLT
MARY VIRGINIA CLARKE **
ALISON ARMSTRONG **
MARK SCUDDER **

DAVID L. WING **
SUSAN G. CAMPBELL **
THERESE M. SCHUELE **
MARK C. THOMPSON **
LINDA S. DICKENS
JAN P. HELDER, JR. **
BRIAN F. STAYTON **
THOMAS J. WILCOX **
PEGGY F. SCHMITT
LORI H. HILL **
NANCY M. LANDIS **
MARY ANN DUPONT **
TIMOTHY C. MEYER
DAVID C. LINDER
DOUGLAS M. WEEMS
SAMUEL P. LOGAN
LYNNE M. BOHSE
MARILYN P. DUNN
MICHAEL L. MCCANN
LINDA P. GUEVEL
MARY S. SHAFER
ALICE J. FISCHER **

CHARLES S. SCHNIDER **
MITCHELL S. PETTIT *
A.K. WNIOROWSKI
SHIRLEY EDMONDS-GOZA
OF COUNSEL

WRITER'S DIRECT DIAL NUMBER IS: 292-8197

* ADMITTED IN KANSAS
** ADMITTED IN KANSAS AND MISSOURI
ALL OTHERS ADMITTED IN MISSOURI

PLEASE REPLY TO THE MISSOURI OFFICE

FILE NO. 2741000-1

August 5, 1991

Ms. Diana L. Newman
United States Environmental
Protection Agency, Region VII
Super Fund Branch
726 Minnesota Avenue
Kansas City, Kansas 66101

Re: CERCLA Section 104(e) Information Request to Laidlaw Waste Systems (Bridgeton), Inc. Laidlaw Waste Systems, Inc., and West Lake Landfill, Inc.

Dear Ms. Newman:

This letter is meant as a clarification of information sent to you in response to Information Requests Nos. 21 and 23. In these responses, the statement is made that Laidlaw does not own and has never owned any of the parcels of land which were contaminated by radioactive materials. West Lake Landfill, Inc., of course, did own these parcels of land prior to conveying its interests in the parcels by general warranty to Rock Road Industries, Inc. (See response to Information Request No. 7.) Laidlaw purchased all the shares of stock of West Lake Landfill, Inc. after the radioactive parcels of property had been so conveyed. (Response to Information Requests Nos. 7 and 8.)

LAI 314

SPENCER FANE BRITT & BROWNE

Ms. Diana L. Newman
August 5, 1991
Page 2

I hope this dispels any confusion which might have occurred in reading responses to Information Requests 21 and 23.

Very truly yours,

A handwritten signature in cursive script, reading "Sandra L. Schermerhorn", with a long horizontal flourish extending to the right.

Sandra L. Schermerhorn

SLS:ms

cc: William R. Cottick
Thomas Fowler
William Reed

TELECOPIER COVER PAGE

DATE: June 12/91 TIME: _____
TO: Ms. Diana L. Newman
EPA Region VII, Superfund Branch
913-551-7063
FROM: William R. Cottick
Associate General Counsel
Laidlaw Inc.
P.O. Box 5028
3221 North Service Road
Burlington, Ontario
L7R 3Y8

RECEIVED
JUN 12 1991
SAFE SECTION

ADDITIONAL COMMENTS/INSTRUCTIONS:

Number of Pages 2 including cover page
Direct line to telecopier is (416) 336-3976
If you do not receive any of these pages, please call back as
soon as possible to: (416) 336-1800

Ask for telecopier operator: Lynn Cairns - Ext. 443

LAI 0315

L A I D L A W

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5078, BRIDGETON, ONTARIO, CANADA, L7R 3Y2 (416) 336-1900 FAX (416) 336-1978

June 12, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

Re: West Lake Landfill, Bridgeton, Missouri

I have written twice and telephoned on a number of occasions, leaving messages for both Diana Newman and Karen Flournoy, regarding the Section 104(e) CERCLA information requests sent to Laidlaw Waste Systems, Inc., West Lake Landfill, Inc., and Laidlaw Waste Systems (Bridgeton) Inc. No response has been received to those communications.

In order to respond to the information requests we need to understand the scope of the area intended to be covered by the requests. We also require additional time to prepare a response, in light of the uncertainty as to the area intended to be covered, and the research and records review that needs to be undertaken.

I would be pleased to discuss this with you at any time.

Yours very truly,



William R. Cottick
Associate General Counsel

WRC/lc

L A I D L A W

CONFIRMATION

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5028, BURLINGTON, ONTARIO, CANADA L7R 3Y8 (416) 336-1800 FAX (416) 336-3976

May 27, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

**Re: CERCLA Section 104(e) Information Requests
to Laidlaw Waste Systems (Bridgeton), Inc.,
Laidlaw Waste Systems, Inc., and
West Lake Landfill, Inc.**

We are in receipt of your referenced Information
Requests dated May 14, 1991.

It would enable us to respond if you are able to define
with more precision the area which is the subject of your
enquiry.

Laidlaw Waste Systems (Bridgeton), Inc. operates a
landfill in the general area which you describe, but which does
not include the area which has been subject to NRC investigations
and which is understood to include radioactive material. We do
not see the relevance or authority for enquiries pertaining to
the present Laidlaw Waste Systems (Bridgeton), Inc. site, and
request your confirmation that such site is not meant to be
included in your enquiry.

I would be pleased to discuss this matter with you at
any time.

Yours very truly,



William R. Cottick
Associate General Counsel

WRC/lc

LAI 0316

CONFIRMATION

L A I D L A W

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5028, BURLINGTON, ONTARIO, CANADA L7R 3Y8 (416) 336-1800 FAX (416) 336-3976

June 12, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

Re: West Lake Landfill, Bridgeton, Missouri

I have written twice and telephoned on a number of occasions, leaving messages for both Diana Newman and Karen Flournoy, regarding the Section 104(e) CERCLA information requests sent to Laidlaw Waste Systems, Inc., West Lake Landfill, Inc., and Laidlaw Waste Systems (Bridgeton) Inc. No response has been received to those communications.

In order to respond to the information requests we need to understand the scope of the area intended to be covered by the requests. We also require additional time to prepare a response, in light of the uncertainty as to the area intended to be covered, and the research and records review that needs to be undertaken.

I would be pleased to discuss this with you at any time.

Yours very truly,



William R. Cottick
Associate General Counsel

WRC/lc

LAI 0317

L A I D L A W

CONFIRMATION

LAIDLAW INC.

3221 NORTH SERVICE ROAD, P.O. BOX 5028, BURLINGTON, ONTARIO, CANADA L7R 3Y8 (416) 336-1800 FAX (416) 336-3976

June 4, 1991

FACSIMILE TRANSMISSION

United States Environmental
Protection Agency
Region VII, Superfund Branch
726 Minnesota Avenue
KANSAS CITY, Kansas 66101
U.S.A.

Attention: Ms. Diana L. Newman

Dear Sirs:

**Re: CERCLA Section 104(e) Information Requests
to Laidlaw Waste Systems (Bridgeton), Inc.,
Laidlaw Waste Systems, Inc., and
West Lake Landfill, Inc.**

Further to my letter of May 27, 1991, I am writing to request a 30 day extension to the response date, to July 15, 1991. I attempted to reach you by telephone, but was advised you were out of the office until June 7.

In order to enable a response, I would like to discuss with you the area (location) which is the subject of your enquiry. It may be that we can provide information which will assist you in focusing your inquiry, but I would like to discuss and confirm with you the approach to be taken.

It does not appear, even when the area subject to your inquiry is clarified, that information can be assembled and a meaningful response prepared within the time frame set out in your information request letters, and an extension is therefore requested.

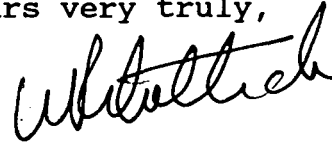
.... /2

LAI 0318

2/....
Ms. D.L. Newman
June 4, 1991

I would be pleased to discuss this matter with you at any time.

Yours very truly,

A handwritten signature in cursive script, appearing to read "W. R. Cottick".

William R. Cottick
Associate General Counsel

WRC/lc